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March 2, 2007

VIA eFiling

The Honorable Mary Pat Thyng  
U.S. District Court  
for the District of Delaware  
844 King Street  
Wilmington, Delaware 19899

Re: Laboratory Skin Care, Inc., et al. v. Limited Brands, Inc., et al.  
D.Del., C.A. No. 06-601 (\*\*\*)

Dear Judge Thyng:

This letter is in response to Melanie Sharp's correspondence to Your Honor of February 28, 2007 on behalf of Laboratory Skin Care ("LSC") regarding the Protective Order in the above-referenced case. The parties disagree on whether Zahra Mansouri, LSC's CEO and President, should be granted access to Limited Brands and Bath & Body Works (hereinafter the "Limited Defendants") confidential information.

The disclosure of confidential information to Ms. Mansouri would greatly prejudice the Limited Defendants. LSC is a competitor of Bath & Body Works. As Ms. Sharp's letter all but concedes, Ms. Mansouri is heavily involved in all aspects of LSC's business. Given Ms. Mansouri's substantial decision making authority at LSC, the risks to the Limited Defendants in disclosing confidential information to her outweigh LSC's alleged case management needs. *See R.R. Donnelley & Sons Co. v. Quark, Inc. et al.*, 2007 U.S. Dist. LEXIS 424, \*5-6 (D. Del. 2007); *Motorola, Inc. v. Interdigital Tech. Corp.*, 1994 U.S. Dist. LEXIS 20714, \*10-11 (D. Del. 1994).

The parties have conferred on several occasions in an attempt to resolve this issue, but to no avail. As such, the Limited Defendants echo LSC's request for the Court's assistance in resolving this matter.

Respectfully,

Francis G.X. Pileggi  
Del. Bar I.D. 2624



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cc: Clerk of the Court  
Melanie Sharp, Esquire (via eFiling)